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October 17, 2016

VIA ECF

The Honorable Brenda K. Sannes
U.S. District Judge
United States District Court for the
Northern District of New York
Federal Bulding and U.S. Courthouse
P.O. Box 7396
Syracuse, NY 13261-7396

Re: *MPM Silicones, LLC v. Union Carbide Corporation,*
No. 1:11-CV-1542 LEK/ATB

Dear Judge Sannes:

I write on behalf of Plaintiff MPM Silicones, LLC (“MPM”) and Defendant Union Carbide Corporation (“UCC”) to provide a status report regarding settlement negotiations as requested by the Court during the July 29, 2016 telephone conference.

The parties have engaged a mediator, although it took longer than expected to engage a mediator with adequate availability during the necessary period. An initial mediation session is scheduled for October 19, 2016, and the parties and mediator have reserved October 20, 2016 for a second day of mediation as necessary.

The parties propose providing an update in two weeks.

Thank you for your attention to this matter.

Respectfully submitted,

s/Jonathan M. Ettinger
Jonathan M. Ettinger

cc: Counsel of Record